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Las Vegas, NV 89101
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9
10 Attorneys for NAPHCARE, INC. an Alabama Corporation; HARRY DURAN, M.D., in his
11 individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH
12 (formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known
as "SCHULTZ") in her individual capacity and RAYMOND MONDORA

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

16 JUSTIN L. TRIPP,

Case No.: 2:17-cv-01964-JCM-BNW

17 Plaintiff,

18 vs.

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISPOSITIVE
MOTION DEADLINE**

19
20 CLARK COUNTY, LAS VEGAS POLICE
DEPARTMENT, OFFICER J. TORRES,
OFFICER M. ROSE, JOHN DOE #1,
NAPHCARE, INC., et al.

21 Defendants.

22
23 Pursuant to LR7-1 and LR 26-3, the parties, by and through their respective counsel of
record, hereby stipulate and request this Court extend the dispositive motion deadline in the
above captioned case for ninety (90) days.

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25 ///

1 **A. DISCOVERY COMPLETED TO DATE:**

- 2 1. Defendants' Interrogatories and Request for Production of Documents to
3 Plaintiff and Plaintiff's Responses;
4 2. Plaintiff's Interrogatories and Request for Production of Documents to
5 Defendants and Defendants' Responses;
6 3. Deposition of Plaintiff;
7 4. Disclosure of Experts

8 **B. DISCOVERY REMAINING TO BE COMPLETED**

9 None – Discovery is closed at this time.

10 **C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES**

11 The parties have been diligent in completing discovery. There are several pending
12 motions that are awaiting orders including whether the Court will permit Dr. Dean Yarbro to be
13 served as a defendant and whether the Court will permit a court-appointed expert for Plaintiff.
14 For these reasons, the parties are stipulating to extend the dispositive motion deadline. This
15 stipulation is made in good faith without any intent to delay this matter.

16 **D. CURRENT DISCOVERY DEADLINES**

- | | |
|--|-------------------|
| 17 1. Close of Discovery | Closed |
| 18 2. Last Day to Amend Pleadings or Add Parties | Closed |
| 19 3. Initial Expert Designation | Closed |
| 20 4. Dispositive Motions | December 28, 2020 |
| 21 5. Pretrial Order | January 26, 2021 |

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28 ///

**E. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING
DISCOVERY**

- | | |
|---|----------------|
| 1. Close of Discovery: | Closed |
| 2. Last Day to Amend Pleadings and Add Parties: | Closed |
| 3. Initial Expert Designation: | Closed |
| 4. Rebuttal Expert Designation: | Closed |
| 5. Last Day for Dispositive Motions: | March 26, 2021 |
| 6. Pretrial Order | April 26, 2021 |

For the foregoing reasons, the parties respectfully request that the Court enter an Order adopting the 90-day extension for dispositive motions set forth in this Stipulation.

Dated: December 4, 2020

Dated: December 4, 2020

KAEMPFER CROWELL

LAURIA TOKUNAGA GATES & LINN, LLP

/s/ Lyssa Anderson, Esq.

By:

Lyssa Anderson, Esq.
Ryan Daniels, Esq.
Attorney for Defendant
Las Vegas Metro PD

/s/ Paul A. Cardinale, Esq.

By:

Paul A. Cardinale, Esq.
Attorney for Defendants
NAPHCARE, INC. an Alabama Corporation;
HARRY DURAN, M.D., in his individual
capacity; ERIC LOPEZ, P.A., in his individual
capacity; RACHEL SCHEIBLICH (formerly
known as "RUDD") in her individual
capacity; KENDRA MEYER (formerly known
as "SCHULTZ") in her individual capacity
and RAYMOND MONDORA

Dated: December 4, 2020

Dated: December 4, 2020

HATFIELD & ASSOCIATES, LTD.

DEPUTY DISTRICT ATTORNEY – CIVIL

/s/ Trevor J. Hatfield, Esq

By:

Trevor J. Hatfield, Esq.
Ryan Daniels, Esq.
Attorney for Plaintiff
Justin L. Tripp

/s/ *Jeffrey S. Rogan, Esq.*
Steven B. Wolfson, Esq.
Jeffrey S. Rogan, Esq.
Attorney for Defendant
Clark County

ORDER

IT IS SO ORDERED that the instant Stipulation to Extend Dispositive Motion Deadline is **GRANTED** and the discovery deadlines shall be amended as follows:

Close of Discovery: *Closed*

Last Day to Amend Pleadings and Add Parties: *Closed*

Initial Expert Designation: *Closed*

Rebuttal Expert Designation: *Closed*

Last Day for Dispositive Motions: March 26, 2021

Joint Pre-Trial Order April 26, 2021

IT IS SO ORDERED

DATED: 10:09 am, December 08, 2020

Bernard Weckler

**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**

Liesa M. Costa

From: Lyssa Anderson <landerson@kcnvlaw.com>
Sent: Friday, December 4, 2020 4:49 PM
To: Jeffrey Rogan
Cc: Paul A. Cardinale; Freda Brazier; Trevor Hatfield; Liesa M. Costa
Subject: Re: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

You may add mine as well.

Best Regards,
Lyssa S. Anderson

On Dec 4, 2020, at 4:21 PM, Jeffrey Rogan <Jeffrey.Rogan@clarkcountyda.com> wrote:

Paul,

You can attach my e-signature to the Stipulation.

Jeff

From: Paul A. Cardinale <pcardinale@ltglaw.net>
Sent: Friday, December 4, 2020 4:01:35 PM
To: Freda Brazier <freda@hatfieldlawassociates.com>; Lyssa Anderson <landerson@kcnvlaw.com>;
Jeffrey Rogan <Jeffrey.Rogan@clarkcountyda.com>; Trevor Hatfield
<thatfield@hatfieldlawassociates.com>
Cc: Liesa M. Costa <lcosta@ltglaw.net>
Subject: FW: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

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My apologies here is the revised one which includes a signature line for Jeff.

<image001.jpg>

Paul A. Cardinale

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Liesa M. Costa

From: Trevor Hatfield <thatfield@hatfieldlawassociates.com>
Sent: Friday, December 4, 2020 4:13 PM
To: Paul A. Cardinale
Cc: Freda Brazier; Lyssa Anderson; jeffrey.rogan@clarkcountyda.com; Liesa M. Costa
Subject: Re: FW: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

Yes, I approve. You can e-sign for me. In re: DPSO, ordinarily the Discovery Orders for these cases are exempt from discovery plans so i just don't know why there is this deadline. Maybe due to an added party?

Trevor J. Hatfield, Esq.,
HATFIELD & ASSOCIATES, LTD.
703 S. Eighth St.
Las Vegas, NV 89101
(702) 388-4469
thatfield@hatfieldlawassociates.com

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On Fri, Dec 4, 2020 at 4:01 PM Paul A. Cardinale <pcardinale@ltglaw.net> wrote:

My apologies here is the revised one which includes a signature line for Jeff.

-
-



Paul A. Cardinale

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From: Paul A. Cardinale

Sent: Friday, December 4, 2020 4:00 PM

To: Freda Brazier <freda@hatfieldlawassociates.com>; Lyssa Anderson <landerson@kcnvlaw.com>; jeffrey.rogan@clarkcountyda.com; Trevor Hatfield <thatfield@hatfieldlawassociates.com>